

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GATSBY FRIMPONG,

Plaintiff,

v.

EVERYREALM INC., REPUBLIC COMPOUND
LLC, d/b/a REPUBLIC REAL ESTATE,
REPUBLIC OPERATIONS LLC, d/b/a REPUBLIC,
OPENDEAL INC., d/b/a REPUBLIC, OPENDEAL
PORTAL LLC, d/b/a REPUBLIC, JESSE YORIO, in
his individual and professional capacities, and
JANINE YORIO, in her individual and professional
capacities,

Defendants.

Index No.: 1:22-10487

**DECLARATION OF
NASIMA HUSSAIN**

I, Nasima Hussain, having personal knowledge of the facts herein, and under penalty of perjury, hereby state:

1. I witnessed regular and repeated sexual harassment of my significant other, Gatsby Frimpong, by Janine Yorio.
2. Gatsby regularly worked from home and I would occasionally overhear portions of his Zoom calls.
3. During one call, I overheard Janine Yorio sexually harass Gatsby by saying, "It is important [for Gatsby to] get the customer wet, just like [he] would with a woman."
4. I was stunned when I overheard this comment and others.
5. I knew immediately that this was a highly harassing and inappropriate thing to say in the workplace, especially given the context and Janine Yorio's overtly sexualized tone.

6. This comment by Janine Yorio and others led me to believe that she had taken a sexual interest in Gatsby.

7. Janine Yorio's apparent sexual interest and sexually harassing comments to Gatsby, some of which were stated within earshot of me, created a significant rift and tension in Gatsby's and my relationship.

8. The comments led me to question whether a consensual romantic relationship existed between them.

9. After overhearing repeated inappropriate and uncomfortable statements in Zoom calls from Ms. Yorio to Gatsby, I came to understand that he was the victim of workplace sexual harassment.

10. I encouraged him to leave Everyrealm because the environment was highly inappropriate, dysfunctional, and detrimental to his mental health and our relationship.

11. Gatsby expressed to me numerous times that he needed to resign because, among other concerns with Janine Yorio's leadership, he could no longer handle the strain that her sexual harassment created in our relationship.

12. This reached another boiling point when Janine Yorio insisted that Gatsby fly on short notice to New York to work with her there.

13. He stated to me that he was uncomfortable flying to work with Janine and I expressed the same discomfort to Gatsby.

14. Gatsby explained to me that he told Ms. Yorio that rather than explicitly report sexual harassment to Janine Yorio, he instead told her he could not fly to work with her in person because his father had died intestate, and Gatsby was in the process of settling the estate and potentially becoming the legal guardian of his younger brother.

15. This declaration does not constitute the entirety of my testimony in this matter.

Pursuant to 28 U.S.C. 1746, I declare under the penalty of perjury the foregoing is true and correct.

Dated: January 6, 2023
London, United Kingdom



Nasima Hussain